

## EXHIBIT 57

Page 1

1                   UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION  
4                   ~ ~ ~ ~ ~

5  
6   IN RE: NATIONAL PRESCRIPTION      MDL No. 2804  
7   OPIATE LITIGATION

8  
9                   Case No.  
10                   17-md-2804

11                   Judge Dan Aaron  
12                   Polster

13                   This document relates to:

14                   The County of Summit, Ohio, et al. v. Purdue  
15                   Pharma L.P., et al., Case No. 18-OP-45090

16                   ~ ~ ~ ~ ~

17                   Videotaped Deposition of  
18                   GRETA JOHNSON, 30(b)(6)

19                   January 15, 2019

20                   8:30 a.m.

21                   Taken at:

22                   Sheraton Suites Akron  
23                   1989 Front Street - Portage Room  
24                   Cuyahoga Falls, Ohio

25                   Stephen J. DeBacco, RPR

<p>1       Have you thought about it?</p> <p>2       A. No. Again, to me, it is an</p> <p>3 aggregate harm to the community.</p> <p>4       Q. All right. I'd like you to pull</p> <p>5 back out --</p> <p>6       MS. WINNER: Oh, no, we didn't. I</p> <p>7 thought we already marked this. Did we mark</p> <p>8 this already? I thought we did mark this.</p> <p>9       Could I just see the --</p> <p>10      THE WITNESS: Sure.</p> <p>11      MS. WINNER: -- exhibits quickly?</p> <p>12 My apologies.</p> <p>13      THE WITNESS: I'm sorry. They're</p> <p>14 not in order.</p> <p>15      MS. WINNER: That's all right.</p> <p>16 You're not required to keep them in order.</p> <p>17      MS. KEARSE: You're working hard</p> <p>18 enough.</p> <p>19      MS. WINNER: Oh, here it is,</p> <p>20 Exhibit 7. I think this is Exhibit 7.</p> <p>21      Q. If you pull out Exhibit 7.</p> <p>22      A. Sure.</p> <p>23      Q. And look at page 14.</p> <p>24      A. Okay.</p> <p>25      Q. And you see at the bottom there's</p>	Page 190	<p>1 to have suffered in this case?</p> <p>2       A. Okay. Let me take a look.</p> <p>3       Q. Sure. Go ahead.</p> <p>4       A. I've reviewed it. Could you</p> <p>5 restate the question?</p> <p>6       Q. Sure. Is this an accurate list of</p> <p>7 the injuries that Summit County claims to have</p> <p>8 suffered in this case?</p> <p>9       A. I -- I feel that it's missing some</p> <p>10 of the major losses that we've incurred.</p> <p>11      Q. Okay. What's missing? I want to</p> <p>12 go back through the list, but before we do</p> <p>13 that, why don't you tell me what's missing from</p> <p>14 the list.</p> <p>15      A. The loss of human capital. And</p> <p>16 certainly there's not a dollar figure you can</p> <p>17 put on the thousands of lives we've lost.</p> <p>18      Q. Is that an injury for which Summit</p> <p>19 County is seeking damages in this case?</p> <p>20      A. It is, because we're seeking</p> <p>21 damages due to the total harm caused by this</p> <p>22 epidemic. The loss of life that really</p> <p>23 exploded in 2016 created another loss, and that</p> <p>24 was a loss of a sense of community. And when</p> <p>25 you talk about the aggregate harm, that is a</p>	Page 192
<p>1       Interrogatory 18 --</p> <p>2       A. I do.</p> <p>3       Q. -- which asks for categories of</p> <p>4 injury.</p> <p>5       A. Uh-huh.</p> <p>6       Q. And then for some other</p> <p>7 information. But then -- if you then go to the</p> <p>8 response, and there's a bullet point list of</p> <p>9 categories of injury.</p> <p>10      Do you see that?</p> <p>11      A. I do.</p> <p>12      Q. Do you -- is this one of the</p> <p>13 interrogatory answers that you reviewed?</p> <p>14      A. It is.</p> <p>15      Q. Does this list look familiar to</p> <p>16 you?</p> <p>17      A. Yes. Sorry.</p> <p>18      MS. WINNER: Are you okay? Do you</p> <p>19 need a break?</p> <p>20      THE WITNESS: No, I'm okay.</p> <p>21      Q. As you understand it, does -- is</p> <p>22 this a -- does this -- is everything on this</p> <p>23 list -- let me strike that.</p> <p>24      Is this a -- an accurate list of</p> <p>25 the injuries that Summit County has -- claims</p>	Page 191	<p>1 harm that we will be trying to recover from for</p> <p>2 decades.</p> <p>3       To declare a state of emergency in</p> <p>4 Summit County was not something that was easily</p> <p>5 reached, because it sends an alarm bell to</p> <p>6 businesses and to people seeking to relocate</p> <p>7 that we have a problem. And we're no different</p> <p>8 than anyone else, but we were the grownups in</p> <p>9 the room enough to acknowledge what the problem</p> <p>10 was and use the platform of the executive's</p> <p>11 office to bring attention to it.</p> <p>12      So the losses that are monetized</p> <p>13 certainly here, I know that Brian can speak to</p> <p>14 those directly and that Ms. Miller-Dawson can</p> <p>15 as well.</p> <p>16      But the aggregate loss is -- is not</p> <p>17 limited to what you can put on a paper. The</p> <p>18 overwhelming sense of hopelessness that took</p> <p>19 over this community in 2016, you can't monetize</p> <p>20 that. Every single day the newspaper was</p> <p>21 reporting on the overdose death rates. You</p> <p>22 could not go into a community setting where</p> <p>23 there were not weeping mothers talking about</p> <p>24 their children.</p> <p>25      So you asked me before if I had</p>	Page 193

<p style="text-align: right;">Page 194</p> <p>1 personal contact with it, and I'm lucky. I'm    2 lucky in that my family has not. But it is    3 personal to me when parents and community    4 members come to their government looking for    5 answers, looking for help, those can't be    6 monetized. Those can't be bullet-pointed,    7 because that loss of human capital and the loss    8 of trust in the community, in doctors, in    9 patient care, because they know now how their    10 kids started. They know what caused this,    11 and -- and that is a harm that this community    12 will be trying to rebuild for decades.</p> <p>13 Q. Okay. Ms. Johnson, what I'm asking    14 you right now is whether there are any injuries    15 for which Summit County is seeking damages in    16 this case that are not listed in the response    17 that appears on pages 15 to 17 of this exhibit.</p> <p>18 A. The medical --</p> <p>19 (Telephonic interruption.)</p> <p>20 MS. WINNER: If you're on the    21 phone, if you would please put yourself on    22 mute.</p> <p>23 A. Are the increased costs to the    24 medical examiner's office listed here?</p> <p>25 Q. I'm sure it is. If not, we'll come</p>	<p style="text-align: right;">Page 196</p> <p>1 The other part of that, opioid    2 epidemic that impacts that, is that we have    3 created a new class of felons who cannot seek    4 certain employment and might not be able to    5 seek the employment they had prior to falling    6 victim to addiction.</p> <p>7 So I think there's -- there is a    8 loss that's beyond just the physical presence    9 of people we've lost, but also the ability of    10 people to work in certain fields because of the    11 felonization of -- of this epidemic.</p> <p>12 Q. Anything else that's not on the    13 list? An injury for which Summit County seeks    14 damages in this case?</p> <p>15 A. I think it could be argued that --    16 the very last bullet point is cost for child    17 services and foster care for opioid-dependent    18 babies and foster children, so that's just a    19 really small portion of it.</p> <p>20 Our -- our Children's Service Board    21 had to seek an increase in their levy this    22 year. And levy campaigns cost money. And the    23 driving factor behind the request for increase    24 is the opioid epidemic. And so the costs of    25 that campaign really to try and support this</p>
<p style="text-align: right;">Page 195</p> <p>1 back to it.</p> <p>2 A. The other costs that I think should    3 be reflected -- and again, probably tough to    4 monetize -- is the compassion fatigue that our    5 first responders and treatment providers are    6 incurring, and sort of the resources that we're    7 trying to put toward that effort of making sure    8 that those folks are supported, that they don't    9 become overwhelmed by hopelessness, and that    10 they don't become overwhelmed by the sheer    11 volume and turn cold to it.</p> <p>12 So there have been efforts to try    13 and address that, both through the medical    14 community and through the first responder    15 community and all of those things. Any time    16 there's an investment of time, there's an    17 investment of treasure, and I think that that    18 is something that's missing.</p> <p>19 Q. Anything else?</p> <p>20 A. I think that there's also -- the    21 portion that talks about the loss of tax    22 revenue due to the decreased efficiency and    23 size of the working population, I read that as    24 we had a lot of people die, so our population    25 decreased.</p>	<p style="text-align: right;">Page 197</p> <p>1 fundamental service I feel like could be    2 included with the Children's Services portion.</p> <p>3 Q. Anything else? I'm not asking you    4 to explain anything that's here. I'm going to    5 go --</p> <p>6 A. Sure.</p> <p>7 Q. -- through each item that's on the    8 list. I just wanted to know if there's    9 anything else that's not on the list.</p> <p>10 A. I don't see anything that's    11 standing out right now.</p> <p>12 Q. Okay. Well, let's go back to the    13 top of the list, then.</p> <p>14 A. Okay.</p> <p>15 Q. The first item is, "Losses caused    16 by the decrease in funding available for    17 Plaintiff's public services for which funding    18 was lost because it was diverted to other    19 public services designed to address the opioid    20 epidemic."</p> <p>21 What public services -- for what    22 public services was funding lost because it was    23 diverted to other public service?</p> <p>24 A. Well, specifically in Summit County    25 we have deferred capital improvements. We've</p>

<p style="text-align: right;">Page 198</p> <p>1 deferred, you know, what I would call    2 enhancement projects, things meant to enhance    3 our community because our resources were    4 laser-focused on the opioid epidemic.</p> <p>5 So where public health, for    6 instance, really would like to spend their time    7 promoting this T21 initiative that they have,    8 eliminating the ability for our youth to buy    9 tobacco products. A lot of science behind how    10 tobacco can change your brain makeup and how    11 it's important to not do that at an early age.</p> <p>12 I know that that is an initiative they take    13 really seriously and wanted to promote, but it    14 really takes a back seat to the opioid    15 strategies and -- and programs.</p> <p>16 Additionally, in Summit County    17 we've got health issues like anyone else. I    18 didn't know that diabetes was such a huge    19 health issue in Summit County. It is. It's    20 our number one health issue, outside of    21 addiction, that -- that public health was    22 targeting. And -- and all of those things get    23 pushed to the side. Those important community    24 initiatives get pushed to the side, because    25 when people are dying immediately, you know,</p>	<p style="text-align: right;">Page 200</p> <p>1 perform several autopsies for outside agencies    2 for cost, and that was a stream of revenue that    3 we were able to help fund some of -- of the    4 operations there. Can no longer do that    5 because we don't have the capacity to do it,    6 and our -- and the funds there have to go to    7 what's happening in front of them.</p> <p>8 I know that we have used grant    9 dollars to help support the expansion of our    10 drug courts, that perhaps those dollars could    11 have been used in a prevention setting or could    12 have been used for some other law enforcement    13 purpose, but because of the need for increased    14 capacity in drug courts, we -- we have    15 designated grant dollars for that as well.</p> <p>16 And -- and likewise, those judges,    17 their time that would normally have been spent    18 on a variety of different cases is focused    19 on -- on drug cases, and certainly a huge    20 percentage of which are opioids.</p> <p>21 I'm trying to go around the county    22 in my mind.</p> <p>23 I -- that's -- that's -- I think    24 that's where I'm at on that.</p> <p>25 Q. Well, you said -- let me take you</p>
<p style="text-align: right;">Page 199</p> <p>1 it's -- it's all hands on deck for that.</p> <p>2 Q. So --</p> <p>3 A. Obvious --</p> <p>4 Q. Go ahead.</p> <p>5 A. With law enforcement, we have    6 detectives who are, you know, responding to    7 overdose cases frequently. And those, as we've    8 discussed, are incredibly difficult to    9 investigate for a myriad of reasons, and their    10 time is, therefore, tied up in those cases    11 rather than, you know, folks who have had their    12 home burglarized or their car stolen.</p> <p>13 And we also have a lot of our    14 resources being put into things like our Quick    15 Response Teams that we never had to do before,    16 but we know that Quick Response Teams are    17 effective, and so we put money toward them. So    18 the number of other things that don't get the    19 attention or the money that they typically    20 would or should get because we're busy trying    21 to save people's lives with -- with these    22 efforts.</p> <p>23 I know that in the medical    24 examiner's office we have lost a stream of    25 revenue. Our medical examiner's office used to</p>	<p style="text-align: right;">Page 201</p> <p>1 through some of these. This was -- has money    2 been taken away -- that was already allocated    3 to T21 taken away from it?</p> <p>4 A. I don't know that money was taken    5 away, but certainly focus.</p> <p>6 Q. How about money that was dedicated    7 to diabetes, whatever was going to be done    8 about diabetes, has anything been taken away    9 from that?</p> <p>10 A. I -- again, I think where you've    11 got time invested, you know, from people,    12 that's money. So when you take people off of,    13 you know, particular initiatives and refocus    14 them on something else, that is a diversion    15 of -- probably not the right word -- that's a    16 shift in dollars.</p> <p>17 Q. Were specific people taken off    18 diabetes?</p> <p>19 A. I don't know that for sure. I just    20 know that that's not something that they are    21 focused on. I shouldn't say that. That's    22 unfair.</p> <p>23 I know that what is coming out of    24 public health frequently, and investments of    25 new dollars are going into are ways to mitigate</p>

<p style="text-align: right;">Page 202</p> <p>1 harm, harm -- harm reduction for the opioid  2 crisis.</p> <p>3 Q. Okay. What -- but this bullet  4 point talks funding being diverted to other  5 public services --</p> <p>6 A. Right.</p> <p>7 Q. -- so my question is, what was  8 their -- what was the specific funding or -- or  9 resources, whether it was particular people,  10 that -- that was supposed to be -- you know,  11 was allocated out for diabetes and got diverted  12 elsewhere?</p> <p>13 A. I don't -- I don't know how to  14 specifically answer what was allocated for  15 diabetes, but I know we spent \$10,000 on  16 fentanyl strips. \$10,000 that could have been  17 spent on diabetes prevention. \$10,000 that  18 could have been spent on T21. But because harm  19 reduction is so critical in our community,  20 \$10,000 was spent on fentanyl strips.</p> <p>21 The increase in dollars that are  22 being spent on the needle exchange. Certainly  23 those are dollars that weren't previously being  24 spent on needle exchange, but because the  25 demand is so high and the harm reduction</p>	<p style="text-align: right;">Page 204</p> <p>1 overdoses.</p> <p>2 Q. Are there any -- is -- is the -- is  3 Summit County seeking damages in this case for  4 injuries suffered by the City of Akron?</p> <p>5 THE WITNESS: Thank you.</p> <p>6 A. Well, I mean, we don't -- we are  7 separate entities, certainly. Akron's in  8 Summit County, and what happens in Akron does  9 affect Summit County. So an arrest that's made  10 in the City of Akron by Detective Leonard, that  11 becomes a Summit County case. It's a felony.</p> <p>12 So the City of Akron arrest goes  13 through Akron Municipal Court, comes to Summit  14 County Common Pleas court, goes through our  15 prosecutor's office, goes through our Common  16 Pleas court system, our drug court. Our ADM  17 provides services. Our health department  18 provides services.</p> <p>19 So we're certainly separate  20 entities, but what happens with nearly half of  21 our population impacts what goes on in Summit  22 County.</p> <p>23 Q. Is Summit County seeking damages in  24 this case for injuries suffered by the City of  25 Akron?</p>
<p style="text-align: right;">Page 203</p> <p>1 benefit of that is so great, that those dollars  2 are not being spent on those other things.</p> <p>3 Q. What -- in a -- in a law  4 enforcement category, you say that there are  5 people who are investigating over- --  6 overdoses. Were those people who were  7 previously assigned to do something else  8 specifically, and if so, what?</p> <p>9 A. Well, there are two detectives in  10 the Summit County Sheriff's Office who are  11 general division detectives, but they respond  12 to any fatal overdose scene. So that means  13 they leave their desk and whatever rape,  14 robbery or homicide they're working on and  15 their attention has to be focused on -- on this  16 overdose.</p> <p>17 I know the City of Akron had two  18 detectives who were working in, you know,  19 the -- the drug unit who were earmarked  20 specifically to investigate overdose deaths  21 because there were so many.</p> <p>22 That's to say nothing of all of the  23 other police officers throughout the county who  24 would be proactively policing and are spending  25 lots of time on calls for service regarding</p>	<p style="text-align: right;">Page 205</p> <p>1 MS. FLOWERS: Objection. Asked and  2 answered.</p> <p>3 A. We're -- we're both independently  4 seeking our own damages, is the way I  5 understand the -- the case.</p> <p>6 Q. So if the -- if the City of Akron  7 police department suffers an injury, that's not  8 part of the injury for which Summit County is  9 seeking damages, correct?</p> <p>10 MS. KEARSE: Objection.</p> <p>11 A. Again, it's tough because you get  12 arrested in the city of Akron, you're coming to  13 the Summit County Jail. So I -- I know that  14 they're -- that we're seeking -- we're two  15 separate plaintiffs, certainly, but the  16 aggregate harm, to me, is what I always come  17 back to.</p> <p>18 You know, I will leave to the  19 lawyers to make the determination of -- of  20 where that line separates, but to me it's  21 difficult for me to separate out what happens  22 in Akron from what happens in Summit County  23 because they're the same thing. Everything in  24 Akron is in Summit County.</p> <p>25 Q. Is the --</p>

<p style="text-align: right;">Page 206</p> <p>1 MS. KEARSE: And, Counselor, just  2 again for the record, we've got 30(b)(6)  3 representatives who are going to go  4 specifically to the dollar figures for the City  5 of Akron and for the County of Summit, so I  6 think those questions are probably more  7 appropriate for the 30(b)(6) representatives  8 who will deal specifically with the costs and  9 dollars associated with the recovery.</p> <p>10 Q. Are there any statistics maintained  11 or -- by Summit County concerning any changes  12 in law enforcement activities in areas other  13 than drug enforcement that you attribute to the  14 opioid problem?</p> <p>15 A. I'm sorry. Could you say that  16 again, please?</p> <p>17 Q. Sure. Are there any statistics  18 maintained by Summit County concerning any  19 changes in law enforcement activity in areas  20 other than drug enforcement that you attribute  21 to the opioid problem?</p> <p>22 MS. KEARSE: Object to form.</p> <p>23 A. I -- I feel like I'm -- I'm sorry.  24 I feel like I'm still missing it. Changes  25 in --</p>	<p style="text-align: right;">Page 208</p> <p>1 counties?  2 A. Yes.  3 Q. Okay. So this is just -- this is  4 just a money-making proposition for the County  5 that you're not able to do anymore; is that  6 right?</p> <p>7 MS. KEARSE: Object to form.</p> <p>8 A. Yeah, it wasn't just about making  9 money. We have highly skilled physicians who  10 have different certifications in our medical  11 examiner's office. I believe Dr. Kohler is  12 one of only -- it's either 150 or 200 in the  13 country with certain qualifications. So often  14 her expertise was helpful in difficult cases.</p> <p>15 Q. Well, and the -- the Quick Response  16 Teams, were the -- are these people who were  17 diverted from other activities, and if so,  18 what?</p> <p>19 A. Well, any time a police officer is  20 responding to an overdose, they're not  21 proactively policing. They're not being  22 present in the community. They're taken out of  23 the community for a specific purpose. So  24 again, it's one of those it's hard to quantify  25 because it's the stuff you don't catch.</p>
<p style="text-align: right;">Page 207</p> <p>1 Q. Well, you say that -- you say that  2 these people who were investigating drug  3 overdoses are not investigating something else.  4 Was there -- are there any statistics that are  5 maintained on what other crime is out there  6 and -- and whether it's being addressed at a  7 different level than it was before?</p> <p>8 A. I see what you're saying.</p> <p>9 Certainly the -- the sheriff's  10 department has its annual report, as does the  11 Akron Police Department.</p> <p>12 But again, it's hard to measure the  13 crime we don't catch. We're so focused on  14 opioids and the havoc that they have caused  15 that it would be difficult to graph the crime  16 that they're not catching because of the -- the  17 attention being paid to opioids.</p> <p>18 Q. Do you know whether clearance rates  19 have changed?</p> <p>20 A. I don't know that. I -- I don't --  21 I don't know that.</p> <p>22 Q. Now, you said that the medical  23 examiner's office is no longer able to earn  24 income for doing autopsies for other people,  25 for other counties. Was that, like, other</p>	<p style="text-align: right;">Page 209</p> <p>1 But any time a police officer is  2 dispatched as a part of a QRT, that's a police  3 officer who's not enforcing traffic laws.  4 That's a police officer who's not able to  5 respond to a domestic violence call. It's --  6 it's more officers who have to respond solo and  7 without, you know, a second officer present to  8 those types of cases.</p> <p>9 Q. And -- and again, am I correct that  10 you're not aware of any statistics, hard  11 statistics, about the activities that those  12 officers did not do because they were involved  13 in the Quick Response Teams?</p> <p>14 A. No. It's hard to quantify what you  15 didn't do, I guess.</p> <p>16 Q. All right. Then you say there that  17 you used grant dollars for drug court  18 expansion.</p> <p>19 A. Uh-huh.</p> <p>20 Q. So this was grant -- grant dollars  21 received from a third party?</p> <p>22 A. From the federal government.</p> <p>23 Q. From the federal government. Okay.  24 So this is not -- this is not Summit County tax  25 money you're talking about?</p>

<p style="text-align: right;">Page 210</p> <p>1 A. No, but they're dollars that might 2 have otherwise been used for other 3 opportunities in the County. 4 Q. Were -- was that in the grant 5 documents? Is that money tailored for other -- 6 excuse me -- targeted for other uses? 7 A. That was a DOJ grant that was -- I 8 don't -- it was not specifically for drug 9 courts, but it was fashioned by Summit County 10 employees in an effort to make our needs meet 11 the requirements of the grant, as I recall. 12 Like, it was a pretty broad one. 13 You could apply for many different reasons. 14 But as I recall, it was -- we tailored it to -- 15 to expand drug court. 16 Q. Well, and you don't -- I take it 17 you don't know -- you don't know you would 18 have -- you would have received the grant for a 19 different use for those same funds? 20 MS. KEARSE: Object to form. 21 A. I mean, I can't predict the federal 22 government. I don't think anybody can these 23 days. So, no, I couldn't say that we would 24 have gotten it or not. 25 Q. All right. I think we've covered</p>	<p style="text-align: right;">Page 212</p> <p>1 coordinate efforts and leverage funds, and 2 those are, you know -- personally those are 3 hours that were not spent doing things that 4 could have enhanced our community. Those 5 are -- those are hours that were spent 6 specifically doing things that we would not 7 have been doing had this epidemic not taken 8 place in Summit County. 9 So public services is -- I guess I 10 sort of was just thinking police, but certainly 11 all of the public servants who work for the 12 County, in addition to public health and ADM, 13 have diverted our personal resources to this 14 issue. 15 Q. Have you tracked the -- the 16 hours -- 17 A. No. 18 Q. -- that you spent on this? 19 A. I have not. 20 Q. Do you know if anybody else in the 21 County has done that? 22 A. I don't. But certainly I can 23 personally tell you I have spent what I am 24 confident are hundreds of hours at boards and 25 commission meetings on behalf of the County for</p>
<p style="text-align: right;">Page 211</p> <p>1 the first -- first bullet -- 2 A. Okay. 3 Q. -- pretty thoroughly. 4 Is there anything we have- -- we've 5 failed to cover on the first bullet? 6 I -- so maybe we can move to the 7 second one. "Costs for providing health care 8 and medical care for patients suffering from 9 opioid-related addiction or disease, including 10 overdoses and deaths." 11 A. I'm sorry. If I could go back to 12 the first one. 13 Q. Sure. 14 A. So because of the prevalence of the 15 opioid epidemic -- 16 Q. Uh-huh. 17 A. -- lots of tasks -- task forces, 18 boards, commissions, things like that have 19 sprung up in an effort to educate and -- and 20 promote and -- and treat and combat the whole 21 thing, and a lot of person hours are being 22 devoted to those. So myself, our public safety 23 director, the executive, my staff, the public 24 safety staff have spent countless hours on 25 these boards and commissions trying to</p>	<p style="text-align: right;">Page 213</p> <p>1 this specific purpose. 2 Q. You were not hired specifically by 3 the County for that purpose, correct? 4 A. I was not hired by the County? 5 Q. To -- to deal with opioid issues. 6 Or were you? 7 A. That wasn't the only reason. I -- 8 I think my knowledge of the criminal justice 9 system and my advocacy platform certainly lent 10 itself to the position that the executive hired 11 me at. 12 Q. Did the position that you -- that 13 you were hired for exist before you were hired 14 for it? 15 A. It did the way I was hired. I was 16 hired in as a deputy director of law, and that 17 was a position that existed. 18 January 1st of last year, the new 19 position of assistant chief of staff was 20 created. 21 Q. And then -- and you're also the 22 public spokes- -- 23 A. Correct. Public information 24 officer. 25 Q. Public information officer.</p>

<p style="text-align: right;">Page 238</p> <p>1 for providing mental health services, 2 treatment, counseling, rehabilitation service, 3 and social service to victim of the opioid 4 epidemic and their families."</p> <p>5 Now, I think a lot of these 6 categories overlap.</p> <p>7 A. Yeah.</p> <p>8 Q. So I think a lot of this one we've 9 already talked about.</p> <p>10 Is there anything that fits in this 11 category that you haven't already described for 12 me?</p> <p>13 A. I don't know that we've talked a 14 lot about Children's Services and the costs 15 associated with the increased treatment and 16 placement.</p> <p>17 Q. We have a whole separate bullet 18 point --</p> <p>19 A. Oh, that's right. Sure. Okay.</p> <p>20 Q. -- for that one later. So let's --</p> <p>21 MS. KEARSE: And I'm -- I'm sorry. 22 Which bullet point are you on?</p> <p>23 MS. WINNER: We're on the last one 24 on page 15.</p> <p>25 MS. KEARSE: Okay. All right.</p>	<p style="text-align: right;">Page 240</p> <p>1 MS. WINNER: Oops. Okay. 2 MR. JOHNSON: Oh, now they did. 3 MS. WINNER: Now we're back on. 4 MR. JOHNSON: Thank you.</p> <p>5 A. So this was done in response to a 6 need for not only more treatment beds, but also 7 a variety of treatment options for folks. It 8 really -- it's a large tract of land that the 9 County owns and had for sale that we certainly 10 didn't sell to anyone else because we felt it 11 was so imperative to create this availability 12 of space for -- for these treatment providers.</p> <p>13 Q. Where is this land located?</p> <p>14 A. It's located in Lakemore, which is 15 interesting because it's a landlocked community 16 inside of Springfield, which is just east of 17 Akron.</p> <p>18 Q. You said you had it for sale. How 19 long had it been for sale?</p> <p>20 A. I don't know when the last -- when 21 it -- the last tenants. So it -- I don't know 22 how long it had been for sale.</p> <p>23 Q. The -- are these, Hope United and 24 Dan Gregory's group, whatever its name is, 25 limited to opioid addiction treatment?</p>
<p style="text-align: right;">Page 239</p> <p>1 A. So directly from the County, 2 because of the increased demand for inpatient 3 treatment, as well as other forms of services 4 and counseling centers, the County donated 5 land. There are two separate 501(c)(3) groups 6 in Summit County who were working together and 7 are working together. One called Hope United, 8 which is seeking to create a community center 9 specifically for folks recovering from opioid 10 addiction.</p> <p>11 The other is called -- I've lost 12 it. Dan Gregory's group. It will come to me 13 as I talk about it. They are looking to build 14 an inpatient facility. And they approached the 15 County multiple times looking for land or a 16 building that would make sense.</p> <p>17 Because we could not find the right 18 fit for something they could purchase, we 19 donated over 20 acres of land to these two 20 501(c)(3)s in an effort to co-locate them and 21 provide, really, a campus for treatment. This 22 was done essentially because we saw the need 23 and --</p> <p>24 MR. JOHNSON: They didn't turn the 25 telephone back on.</p>	<p style="text-align: right;">Page 241</p> <p>1 A. I don't think that they are limited 2 to, but they came to us because of. Both of 3 their families are personally affected by the 4 opioid epidemic.</p> <p>5 Hope United was founded by Travis 6 and Shelly Bornstein, and they lost their son 7 to an overdose. And he was a college athlete 8 who became addicted to opioids, and when no -- 9 he could no longer get those, he turned to 10 heroin. And he overdosed, and his body was 11 dumped in a field. And so they very quickly 12 mobilized their community to support this 13 effort of having a place of hope for people to 14 go to.</p> <p>15 And Dan's organization, he also has 16 a family member who has been directly impacted 17 by opioid addiction that started with 18 medication and now has turned to heroin.</p> <p>19 Q. And what is the source of your 20 information about how his addiction started?</p> <p>21 A. I talked with him.</p> <p>22 Q. With him? He told you that?</p> <p>23 A. I talked with Dan, and I talked 24 with Shelly and Travis Bornstein. They lost 25 their son.</p>

<p style="text-align: right;">Page 242</p> <p>1 Q. Okay. But my point is, did you -- 2 do you have any information, other than what 3 these family members told you about that? 4 A. No. He's dead. I mean, this is 5 what happened to him. 6 Q. Well, but, I -- again, you're -- 7 you're a former prosecutor. You know the 8 difference between hearsay and direct -- direct 9 evidence. 10 Do you have any personal knowledge 11 on that point or is it you just know what they 12 told you? 13 MS. KEARSE: Object to form. 14 A. I believe that the parents knew 15 what their child was doing when he was taking 16 prescription medication prescribed to him by 17 his physician after an injury. And they know 18 that he then started seeking heroin. And they 19 know this because he died with a needle in his 20 arm. 21 Q. And that's what they've told you; 22 is that correct? 23 A. That's also what a police report 24 indicates in the way that he died. 25 Q. And does the police report include</p>	<p style="text-align: right;">Page 244</p> <p>1 police departments in Summit County now have a 2 drop-off box, and -- 3 Q. Is that what a dump site is -- 4 A. Yeah. 5 Q. -- a drop-off box? 6 A. Yes, yes. And there have been 7 several initiatives, drug take-back days, where 8 there's specified locations for folks to turn 9 in unused medications. 10 Q. Who runs that? 11 A. It depends. Obviously, all of the 12 different police departments monitor their own 13 drop boxes. The DEA certainly has, I think, 14 either one or two specified days per year, but 15 local law enforcement groups have done their 16 own, and it has gone to a point where we've had 17 local high school groups organize some of these 18 sort of take-back or turn-in days. 19 Q. All right. Well, what is -- 20 what -- just focusing in on the county again. 21 A. Uh-huh. 22 Q. What -- what has Summit County done 23 in this category? 24 A. Well, the health department 25 participates in those, as well as ADM. Those</p>
<p style="text-align: right;">Page 243</p> <p>1 any independent information about the source of 2 his opioid use? 3 A. I don't recall exactly what the 4 police report says. 5 Q. Okay. On this, have we now covered 6 either in our conversation just now or in our 7 conversation before the break, everything 8 that -- that's covered within -- of the last 9 bullet point on page 15? 10 A. That's the best of my ability at 11 this point, yes. 12 Q. Okay. Why don't we skip over the 13 next bullet point and talk about the second 14 bullet point on page 16. 15 A. Uh-huh. 16 Q. Which is costs associated with 17 various public safety and health initiatives 18 related to the opioid epidemic. And again, I 19 don't want us to be repeating ourselves. 20 A. Sure. 21 Q. So is there anything in that 22 category beyond what we've already talked about 23 here today? 24 A. The number of dump sites for 25 medication has increased. I know that most</p>	<p style="text-align: right;">Page 245</p> <p>1 are -- a lot of those initiatives are driven 2 out of the Opiate Task Force meetings. So the 3 health department and -- and the ADM are 4 involved in all of those efforts for those 5 initiatives. 6 Q. Well, other than the -- is there 7 anything else other than the dump sites and the 8 drug take-back days that fits in this category, 9 beyond the things that we've already talked 10 about. I realize some of them would probably 11 fit -- 12 A. Yeah. 13 Q. -- into this category also. 14 A. Did we talk about the fentanyl 15 strips and needles with this? 16 Q. You have. 17 A. Okay. 18 Q. Anything else? 19 A. The -- Dr. Smith and Dr. Kohler 20 presenting at continuing medical education 21 programs. As far as initiatives, that's -- 22 that's what I can come up with at this point. 23 Q. Now, the -- the dump sites for 24 medication and the drug take-back days, those 25 are not limited to opioids, are they?</p>

<p>1       A. No.</p> <p>2       Q. All right. The costs associated 3 with the increased burden on Plaintiff's drug 4 courts, are there specific initiatives 5 associated with opioids that have been 6 undertaken by the drug courts?</p> <p>7       A. They've had to increase capacity. 8 As far as initiatives, I guess I don't know 9 exactly how to frame that other than to say 10 there's been an increase in who becomes 11 eligible for drug court, or I -- we call it 12 "Hope Court" in municipal court. It's "Turning 13 Point" in common pleas court. But I guess it's 14 commonly referred to as "drug court."</p> <p>15       But it used to be, 10 and 15 years 16 ago even, the only courses that went to drug 17 court was drug cases, possession cases, and 18 there's been a shift in policy and in thought 19 that it should be expanded to cover theft cases 20 or other things that were committed as a result 21 of addiction and drug-seeking behavior.</p> <p>22       So the expansion of and sort of the 23 change in philosophy has certainly required 24 additional probation officers, additional 25 caseworkers. Common pleas court now has two</p>	<p>Page 246</p> <p>1 talk about to incur -- to expand the 2 eligibility, that isn't limited to people with 3 opioid problems, is it?</p> <p>4       A. No. But I really think it was the 5 opioid epidemic that awakened this sort of 6 sensibility about rather than criminalizing 7 this behavior, looking at the root of why this 8 person committed theft or why this person 9 committed forgery of this check, rather than 10 just, you know, the punishment for writing a 11 bad check on, you know, either a closed account 12 or someone else's account. And -- and seeing 13 that the reason they did it was they were 14 trying to get money to buy opioids.</p> <p>15       So I think that that created an 16 entire shift in -- in sort of the ideology in 17 our community that -- looking at what we call 18 crime as part of addiction.</p> <p>19       Q. Well, let me ask you this. If -- 20 if opioids were to disappear tomorrow so that 21 all you had --</p> <p>22       A. Please.</p> <p>23       Q. Yeah. I think we all agree with 24 that. At least illegal opioids.</p> <p>25       MS. KEARSE: Objection.</p>
<p>Page 247</p> <p>1 judges. It expanded from one of our three 2 municipal courts to there's now a second drug 3 court. And Barberton Municipal Court and the 4 Stow Municipal Court has an agreement with 5 Akron so that some of their defendants can use 6 the services in Akron.</p> <p>7       Q. Okay. But I want to focus again on 8 Summit, what Summit County --</p> <p>9       A. Right, and we --</p> <p>10      Q. -- has incurred here.</p> <p>11      A. -- we -- so the court system is 100 12 percent Summit County, the common pleas court 13 system.</p> <p>14      Q. Okay. I see.</p> <p>15      A. Yes. So that's general fund money 16 for the most part. Some of the grant funds 17 that we talked about previously helped support 18 drug court, but that -- that is a Summit County 19 cost.</p> <p>20      Q. To the extent Summit County -- 21 okay, Summit County versus another 22 jurisdiction. But some of that money may be 23 paid with grant funds?</p> <p>24      A. Yes.</p> <p>25      Q. Now, this policy change that you</p>	<p>Page 249</p> <p>1       Q. And if the -- if opioids were to -- 2 the opioid problem was to disappear tomorrow 3 and all you had left were cocaine addicts, meth 4 addicts, people addicted to other substances, I 5 assume you would still -- you know, Summit 6 County would still want to have a drug court 7 for those people?</p> <p>8       A. Yes. We had a drug court before 9 the opioid epidemic.</p> <p>10      Q. And this policy change is something 11 you would probably still keep in place?</p> <p>12      A. I would certainly hope so.</p> <p>13      Q. Okay. Costs associated with 14 cleanup of public parks, spaces, and facilities 15 of needles and other debris and waste of opioid 16 addiction. Is this something that's actually 17 tracked somehow in the county?</p> <p>18      MS. KEARSE: Object to form.</p> <p>19      A. I would suggest that that be 20 referred to Mr. Nelson, that the -- Summit 21 County Metroparks is a separate entity. They 22 are funded by a levy. So I don't know what 23 their tracking on that part is.</p> <p>24      Q. Do you know anything about this 25 cost category?</p>

<p style="text-align: right;">Page 250</p> <p>1 A. I do not.  2 Q. Loss of tax revenue due to  3 decreased efficiency and size of the working  4 population in Plaintiff's communities, and due  5 to other impacts on property values and other  6 tax generators for Plaintiff.  7 Has there been any kind of study  8 done to evaluate this category of loss?  9 A. Not by Summit County. We do have a  10 division of workforce development, and we also  11 have an economic and community development  12 division within the executive's office. And  13 part of what we do in that division is make  14 house calls, essentially, to the businesses in  15 Summit County.  16 And the number one complaint or the  17 number one need of employers in Summit County  18 is workforce. And by and large these are  19 manufacturing jobs. And going one step  20 further, the number one issue is having folks  21 who can pass a drug test, and there's a lot of  22 concern from our business community that they  23 can't expand because the workforce is not  24 healthy enough to do so.  25 And, again, as I previously said,</p>	<p style="text-align: right;">Page 252</p> <p>1 Q. And that is generally considered at  2 the level of full employment, correct?  3 A. I don't know -- I don't know how to  4 respond to that.  5 Q. Do you -- but 4 percent is a pretty  6 low unemployment rate, is it not?  7 MS. KEARSE: Object to form.  8 A. I think it depends on if you're one  9 of the people who's employed and if you're one  10 of the people who is looking for a workforce.  11 Q. Well, let me ask you this way. If  12 you are somebody who is looking for a  13 workforce, you typically will have a much more  14 difficult time filling positions at 4 percent  15 unemployment rate than, say, at 7 or 8 or 10  16 percent unemployment rate, correct?  17 A. I think it depends on the industry.  18 And the unemployment rate doesn't look at our  19 underemployment, where we've got folks who  20 perhaps were nurses or other professionals that  21 are regulated by the State, who now, with a  22 felony conviction, can no longer practice in  23 the field they were previously, you know,  24 paying income tax and owned a home and now work  25 at minimum wage jobs or a lower paying wage job</p>
<p style="text-align: right;">Page 251</p> <p>1 there are a lot of industries that are  2 regulated, either by statute or ordinance, that  3 disallow felons. And with this epidemic  4 creating a new class of not only sick people,  5 it created a new class of sometimes  6 unemployable people in certain fields because  7 of their felony classification.  8 And again, it's also an issue of  9 how can we measure what we didn't know? When  10 you couldn't look at a newspaper in 2016  11 without seeing a headline about death and  12 opioid affliction in the community, it's hard  13 to say what we missed when it comes to economic  14 development or tax generators, because, A, we  15 were busy trying to address the issue, and, B,  16 if you were a site selector at that time, I  17 can't imagine that Summit County would have  18 been a desirable location if you were looking  19 to relocate a new manufacturing plant or a  20 headquarters of some type of economic  21 development industry.  22 Q. What's the unemployment rate in  23 Summit County right now?  24 A. I think it's right around 4  25 percent.</p>	<p style="text-align: right;">Page 253</p> <p>1 than previously.  2 Q. How many people are in that  3 category?  4 A. I don't know.  5 Q. Are you aware of any specific  6 business investments that businesses have  7 considered making in Summit County but have not  8 made as a result of the opioid crisis?  9 A. No. As I said, trying to capture  10 what you never knew was happening is -- is  11 incredibly difficult, at least for us.  12 Q. And Northeast Ohio has had -- been  13 struggling with attracting investment for a  14 number of years now, hasn't it?  15 A. I -- I don't really want to speak  16 for Northeast Ohio. I feel like Summit County  17 has weathered the financial crisis in some  18 better ways than most, but it's because we've  19 been -- we operate with a thousand less  20 employees than we did 10 years ago, so I  21 couldn't say what Northeast Ohio has -- has or  22 has not you attracted.  23 Q. Well, as the -- was the -- did the  24 financial crisis hit Summit County hard?  25 A. Yes, it did.</p>

<p style="text-align: right;">Page 254</p> <p>1 Q. Is there -- are there any specific 2 tax revenue streams that you can identify for 3 which you believe there is a quantifiable 4 impact?</p> <p>5 A. I would have to defer to -- to 6 Mr. Nelson that, on the tax revenue streams. I 7 mean, we're a sales-tax-based fund, our -- I 8 would defer to Mr. Nelson that one.</p> <p>9 Q. So is the answer you don't know?</p> <p>10 MS. KEARSE: Object to form.</p> <p>11 A. As I sit here today, I -- I can't 12 answer that question.</p> <p>13 Q. When it talk -- when you -- when 14 this response talks about tax revenue, is it 15 talking about sales tax revenue?</p> <p>16 A. I think it includes sales tax -- 17 sales tax revenue, but also income tax revenue. 18 When you're not working, you're not paying 19 income tax, and -- and that can impact the 20 County as well. While we don't collect income 21 tax, what affects Akron affects Summit County, 22 and when their numbers are down, we have to 23 find ways to help support our 31 communities.</p> <p>24 And so when, quote-unquote, 25 business is good for the 31 communities,</p>	<p style="text-align: right;">Page 256</p> <p>1 the page, talks about cost associated with 2 impact of opioid epidemic on Plaintiff's 3 vehicle fleets.</p> <p>4 What does that relate to?</p> <p>5 MS. KEARSE: Object to form.</p> <p>6 MS. WINNER: Oh, you meant -- you 7 were objecting to my tone of voice.</p> <p>8 MS. KEARSE: Well, I didn't want to 9 say it that way, but, yeah.</p> <p>10 MS. WINNER: Yeah, okay. Fair 11 enough.</p> <p>12 MS. KEARSE: I guess you were 13 responding to how I said "object to form."</p> <p>14 (Laughter.)</p> <p>15 MS. KEARSE: We got to have some 16 fun at this.</p> <p>17 A. So there are multiple fleets of 18 vehicles in the County. Surprising number of 19 vehicles. And as I sit here, the -- the thing 20 that really stands out to me is that, you know, 21 buying new vehicles for our sheriff's 22 department, for the investigators and the 23 prosecutor's office, all the way down to the 24 surveyors for the fiscal office, certainly when 25 the bottom line is impacted, the timeliness of,</p>
<p style="text-align: right;">Page 255</p> <p>1 business is also good for Summit County. And 2 likewise, when it's not, the strain and the 3 leveraging of dollars has to become much more 4 creative.</p> <p>5 Q. So am I correct that Akron charges 6 income tax, but Summit County does not?</p> <p>7 A. Well, that -- that's our primary -- 8 the way our general fund is -- is set up is 9 that we operate -- all counties in Ohio operate 10 on sales tax revenue.</p> <p>11 Q. Are there any other tax revenues 12 that the County receives that are affected, you 13 believe, by the opioid crisis?</p> <p>14 A. Sitting here today, I don't -- I 15 don't know that I can come up with any.</p> <p>16 MS. KEARSE: And for the record, I 17 think she already deferred to Mr. Nelson as 18 well, so if there's anything she's missing, 19 Mr. Nelson can fill that in for you.</p> <p>20 MS. WINNER: I'm sure Mr. Nelson 21 will be a fount of information.</p> <p>22 MS. KEARSE: Save some time.</p> <p>23 MS. WINNER: We will.</p> <p>24 Q. Okay. Let me then ask -- go down a 25 couple more, toward the next to last bullet on</p>	<p style="text-align: right;">Page 257</p> <p>1 you know, replacement -- I certainly hope it's 2 not repair -- but replacement of these vehicles 3 isn't a priority when we're using our funds 4 elsewhere. Beyond that, I can't speak to that 5 one.</p> <p>6 Q. Okay. Then go on, the next one is 7 costs for Plaintiff to properly and adequately 8 abate the nuisance created by the opioid 9 epidemic.</p> <p>10 And, again, excluding everything 11 you've already described, is there anything 12 else that falls into this category?</p> <p>13 A. This one's hard for me, because 14 there's so much that I cannot, as -- as an 15 attorney and as whatever my hats are, I'm not 16 an economist. These kids who have gone into 17 our Children's Services system, the babies born 18 addicted, the people who this -- this entire 19 population who is now living with addiction.</p> <p>20 Luckily, we've gotten better at 21 harm reduction, but what that means is that now 22 we have this population of people who are 23 living with addiction who are going to our 24 community health center for methadone every 25 single day. The costs for that, to me, are</p>

<p>1 endless.</p> <p>2 So, I mean, we've -- as I said,</p> <p>3 there's always a dead horse that needs to be</p> <p>4 beaten somewhere, but we have gone over so many</p> <p>5 of these things, but we haven't talked about</p> <p>6 the future. These costs we've been talking</p> <p>7 about in the past tense. These are costs that</p> <p>8 are being incurred today. They are costs --</p> <p>9 these same costs are going to be incurred</p> <p>10 tomorrow. There are still kids coming into CSB</p> <p>11 at higher rates than before.</p> <p>12 And so it's like looking at these</p> <p>13 numbers from the past and putting them out into</p> <p>14 when? I don't know, because the generational</p> <p>15 addiction that's been created by this epidemic</p> <p>16 is something that we've never seen before, and</p> <p>17 so it's hard for me, as an attorney and not an</p> <p>18 economist, to project what we might need for</p> <p>19 these kids and for these families.</p> <p>20 Q. Is that your full answer?</p> <p>21 A. That is.</p> <p>22 Q. All right. Then the last bullet is</p> <p>23 costs for child services and foster care for</p> <p>24 opioid-dependent babies and foster children.</p> <p>25 And you talked a little bit about</p>	Page 258	<p>1 alarming is that that isn't the case with</p> <p>2 opioids, because it's a familial addiction.</p> <p>3 Mom is addicted. Brother is addicted.</p> <p>4 Grandparent is addicted. And so the ability to</p> <p>5 place a child with a family member has</p> <p>6 decreased. And when the child has to be placed</p> <p>7 with a non-family member, the costs of that</p> <p>8 placement are higher than they are with a</p> <p>9 family member.</p> <p>10 Q. Well, I'm -- one thing that just</p> <p>11 struck me as you were talking just now is you</p> <p>12 talked about familial addiction. When a --</p> <p>13 when you see, you know, mom, dad, grandma, all</p> <p>14 addicted to opioids, did all of them start with</p> <p>15 prescription opioids from a doctor, or does it</p> <p>16 start with one particular family member and</p> <p>17 then it spreads to others?</p> <p>18 A. My experience has shown me that</p> <p>19 when one person comes home with a bottle full</p> <p>20 of 60 or 90 pills and that person either uses</p> <p>21 or doesn't use them all, the readily available</p> <p>22 supply in the home is what leads to this</p> <p>23 familial addiction. Everybody has access to</p> <p>24 this oversupply, and it's right there in front</p> <p>25 of them because there are so many pills.</p>	Page 260
<p>1 this earlier. I guess my first question is, to</p> <p>2 what extent are the -- the -- are child</p> <p>3 services and foster care services tracked in</p> <p>4 terms of the extent to which they relate</p> <p>5 explicitly to opioid addiction?</p> <p>6 A. I believe in -- in 2016, our</p> <p>7 Children's Services Bureau began tracking,</p> <p>8 like, a specific -- I don't know what they</p> <p>9 would call it, but I would call it, like, the</p> <p>10 entrance point, what brought this kid into our</p> <p>11 system. And I believe it was in 2016, maybe</p> <p>12 later in the year, they began specifically</p> <p>13 identifying those. And I believe Director</p> <p>14 Barnes talked about that, that they had seen an</p> <p>15 increase to the point that it became imperative</p> <p>16 that they focus on it so that they could</p> <p>17 quantify and understand how to budget for it.</p> <p>18 The costs for foster care and</p> <p>19 placement have grown additionally, because with</p> <p>20 the prior forms of addiction that we'd seen in</p> <p>21 Summit County -- crack, methamphetamine,</p> <p>22 cocaine -- familial placement was always</p> <p>23 priority. Can a -- can this child be placed</p> <p>24 with a family member?</p> <p>25 And what has been incredibly</p>	Page 259	<p>1 Q. If somebody were able to make -- to</p> <p>2 wave a magic wand and make heroin and fentanyl</p> <p>3 disappear, would the opioid epidemic in Summit</p> <p>4 County look different than it does now?</p> <p>5 MS. KEARSE: Object to form. Calls</p> <p>6 for speculation.</p> <p>7 A. I mean, if I had a magic wand, I'd</p> <p>8 go back much farther than that and make sure</p> <p>9 that the doctors and our community was educated</p> <p>10 about the addiction rates and levels and let</p> <p>11 people know, if you get addicted to this, you</p> <p>12 are very likely going to be out in the street</p> <p>13 looking for heroin.</p> <p>14 Q. Okay. But that wasn't my question.</p> <p>15 My question was if heroin wasn't available</p> <p>16 anymore, fentanyl wasn't available anymore,</p> <p>17 what impact, if any, would that have on the</p> <p>18 opioid situation in Summit County?</p> <p>19 A. If it --</p> <p>20 MS. KEARSE: Object to form.</p> <p>21 A. If it wasn't available in Summit</p> <p>22 County and people were addicted to opioids,</p> <p>23 they'd go someplace else to get it. That's</p> <p>24 how -- that's how this addiction is</p> <p>25 functioning. The -- it's not like they're</p>	Page 261

<p style="text-align: right;">Page 262</p> <p>1 not -- they're going to stay in bed and be 2 like, "Meh, it's not out there, so I'm good." 3 The pill sickness that people get is what 4 drives them out to find that heroin, because 5 the pills were too expensive or harder to get. 6       So, I mean, that magic wand -- 7 heroin's been around. It's not like this is 8 the first time heroin has been in Summit 9 County. But it was not so incredibly prevalent 10 until the space created by the opioid industry 11 brought it upon us. 12       So, yeah, it would change if there 13 wasn't any heroin available or fentanyl 14 available, but I still have this huge addicted 15 population who are going to be sick, who are 16 going to be seeking pills or seeking opium in 17 some fashion. 18       Q. Would you expect overdoses to 19 decline in that situation? 20       A. Well, certainly the overdoses from 21 fentanyl, if it wasn't available, would go 22 away. But I don't -- I don't know that I 23 can -- can speculate to that. 24       Q. Okay. That's fair enough. Let me 25 ask you, actually, a different question that I</p>	<p style="text-align: right;">Page 264</p> <p>1 Ohio's Amended Responses and 2 Objections to the Manufacturer 3 Defendants' First Set of 4 Interrogatories and the National 5 Retail Pharmacy Defendants' First 6 Set of Interrogatories Re: 30(b)(6) 7 Topics, was marked for purposes of 8 identification.) 9       - - - - - 10 (Thereupon, Deposition Exhibit 11, 11 Plaintiffs The City of Cleveland, 12 County of Cuyahoga, County of Summit 13 and City of Akron's Supplemental 14 Amended Responses and 15 Objections to the Manufacturer 16 Defendant's First Set of 17 Interrogatories, Submitted Pursuant 18 to Discovery Ruling No. 13, was 19 marked for purposes of 20 identification.) 21       - - - - - 22 (Thereupon, Deposition Exhibit 12, 23 Spreadsheet Titled "Confidential 24 Protected Health Information - 25 Produced Under a Protective Order -</p>
<p style="text-align: right;">Page 263</p> <p>1 intended to ask you earlier, and I forgot. 2       Has Summit County seen an issue 3 with drug dealers selling counterfeit 4 prescription opioids? 5       A. As far as -- I know that there have 6 been some that were like fentanyl that were 7 being told as -- yes, I'm -- I am aware of 8 that. 9       Q. Has that been a significant 10 problem? 11       A. I mean, any time fentanyl is in the 12 community, if it's less than a milligram, it's 13 a significant problem, because we know how 14 potent it is. 15       MS. WINNER: I think I'm going to 16 turn it over to one of my colleagues, so why 17 don't we go off the record so we can switch 18 places and move our boxes around. 19       THE WITNESS: Sure, okay. 20       THE VIDEOGRAPHER: Off the record 21 at 3:15. 22       (A recess was taken.) 23       - - - - - 24 (Thereupon, Deposition Exhibit 10, 25 Summit County and the City of Akron,</p>	<p style="text-align: right;">Page 265</p> <p>1 Attorneys' Eyes Only, was marked for 2 purposes of identification.) 3       - - - - - 4 (Thereupon, Deposition Exhibit 13, 5 Spreadsheet Titled "Confidential 6 Protected Health Information - 7 Produced Under a Protective Order - 8 Attorneys' Eyes Only, was marked for 9 purposes of identification.) 10       - - - - - 11 (Thereupon, Deposition Exhibit 14, 12 1/8/2019 Letter from Atty Linda 13 Singer to Special Master David Cohen 14 Re: Plaintiffs' Response to 15 Manufacturer Defendants' Renewed 16 Motion to Compel Immediate and Full 17 Compliance with Discovery Ruling 18 Nos. 5 and 13, was marked for 19 purposes of identification.) 20       - - - - - 21 (Thereupon, Deposition Exhibit 15, 22 Spreadsheet Titled "Confidential 23 Protected Health Information - 24 Produced Under a Protective Order - 25 Attorneys' Eyes Only, was marked for</p>

<p>1       purposes of identification.)  2       - - - - -  3       (Thereupon, Deposition Exhibit 16,  4       Spreadsheet Titled "Confidential  5       Protected Health Information", was  6       marked for purposes of  7       identification.)  8       - - - - -  9       (Thereupon, Deposition Exhibit 17,  10      Document Listing Names and Dates of  11      Summit County Overdose Deaths, was  12      marked for purposes of  13      identification.)  14      - - - - -  15      THE VIDEOGRAPHER: On the record at  16 3:38.  17      EXAMINATION OF GRETA JOHNSON  18 BY MS. FEINSTEIN:  19      Q. Good afternoon, Ms. Johnson.  20      A. Good afternoon.  21      Q. My name is Wendy West Feinstein.  22 We met briefly this morning before we went on  23 the record. I represent the Teva Defendants.  24      I'm going to take over the  25 examination now, and a few of my colleagues may</p>	Page 266	<p>1 Plaintiffs used to identify the information  2 required by the interrogatories at issue in  3 Discovery Ruling No. 5.  4      Q. Do you understand that ruling?  5      A. Yes, I do.  6      Q. Have you had an opportunity to  7 review the Plaintiff's responses pursuant to  8 Special Master Cohen's order?  9      A. Yes.  10     Q. And did you do that in preparation  11 for your deposition today?  12     A. I -- I didn't do it for week -- the  13 weekend.  14     Q. You didn't do it for fun.  15     A. Yes, yes. I absolutely did, yes.  16     Q. Did you speak with anyone, aside  17 from counsel, to prepare to testify on these  18 topics?  19     A. No, I -- not specifically about  20 those interrogatories.  21     Q. Did you talk with anyone at  22 Rawlings about these topics?  23     A. No.  24     Q. Did you review any documents  25 specifically to respond to these top- -- or to</p>	Page 268
<p>1 have some additional questions after I'm done,  2 okay?  3      A. Sure.  4      Q. You were designated on a number of  5 topics, and my colleague, Ms. Winner, went  6 through some of those topics with you about  7 your designations. Four of the topics that  8 were not the in the letter, but that were  9 confirmed by e-mail, were Topics 4, 5, 6, and  10 19.  11     A. Yes. I'm familiar with that.  12     Q. Are you prepared to testify on  13 those topics today?  14     A. I am.  15     MS. FLOWERS: To be clear, though,  16 it's not 4, 5, 6 and 19. It's 4, 5, 6, and 19  17 as rewritten by Special Master Cohen.  18     MS. FEINSTEIN: Exactly. Yes.  19 Thank you, Counsel. And we can read that into  20 the record now.  21     Special Master Cohen, after some  22 back and forth among counsel, revised those  23 topics and directed that with respect to Topics  24 4, 5, 6, and 19, Plaintiffs must designate a  25 person to testify on the criteria that</p>	Page 267	<p>1 be prepared to testify about these topics?  2      A. Other than the interrogatories and  3 the responses? Outside of that, just  4 discussion with counsel.  5      Q. Did you review Special Master  6 Cohen's order?  7      A. I've seen it, yes.  8      Q. And it's attached to Exhibit 1,  9 right?  10     A. Yes, yes.  11     Q. Okay, good. During the break, your  12 counsel and everyone here was very patient as I  13 handed you a series of documents, and I'd like  14 to go through those right now.  15     The -- the first document that we  16 marked as an exhibit and that I put in front of  17 you should be Exhibit 10, which is Summit  18 County and the City of Akron, Ohio's Amended  19 Responses and Objections to the Manufacturer  20 Defendants' First Set of Interrogatories and  21 the National Retail Pharmacy Defendants' First  22 Set of Interrogatories.  23     Do you have that in front of you as  24 Exhibit 10?  25     A. I do have that in front of me, yes.</p>	Page 269